

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Rachel Ann Nunez, Debtor

**Case No. 22-50612-KMS
Chapter 13**

**DEBTOR'S CERTIFICATION AND MOTION FOR ENTRY OF CHAPTER 13
DISCHARGE PURSUANT TO 11 U.S.C. §1328 (a) and (h)**

This motion seeks an order discharging the debtor(s) pursuant to § 1328(a) of the bankruptcy code. If you oppose this motion, you must file a response with the court within twenty-one (21) days from the date listed below in the certificate of service. Your response must set forth the specific factual allegations with which you disagree, and a copy of your response must be served on the debtor(s) and debtor's(s') attorney. If no timely response is filed, the court may grant this motion without holding a hearing. A timely response is necessary for a hearing to be held.

1. By signing below, the debtor certifies under penalty of perjury that the following statements are true and correct:
 - A. For cases filed on or after March 10, 2008, I have completed a personal financial management instructional course provided through an agency approved by the United States Trustee and have filed the certificate of completion provided by the course provider (in a joint case, both husband and wife must each complete the course and file a certificate of completion) or the approved personal financial management course provider has notified the court that I have completed a post-petition instructional course concerning personal financial management. **11 U.S.C. § 1328(g)**
 - B. All pre-petition amounts owed by me on domestic support obligation ("Domestic Support Obligation" as defined at 11 U.S.C §101(14A)), if any, have been paid to the extent provided by the plan. All post-petition amounts owed by me on a domestic support obligation, if any, have been paid. **11 U.S.C §1328(a)**
 - C. I have not received a discharge under chapter 7, 11 or 12 of the Bankruptcy Code in a prior case filed during the four-year period preceding the date that the petition was filed in this case. **11 U.S.C. §1328(f)(1)**
 - D. I have not received a discharge under chapter 13 of the Bankruptcy Code in a prior case filed during the two-year period before the date that the petition was filed in this case. **11 U.S.C. §1328(f)(2)**
 - E. I have not been convicted of a felony, the circumstances of which would demonstrate that the filing of this bankruptcy case constituted an abuse of the provisions of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(A)**
 - F. If I owe a debt arising from: (i) any violation of any State or Federal securities laws, regulations or orders, (ii) fraud, deceit or manipulation in a fiduciary capacity or in connection with the purchase or sale of any security, (iii) a civil remedy under 1964 of Title 18 of the United States Code, or (iv) that caused serious injury or death to another individual in the preceding five (5) years, in the preceding five (5) years, then I have not claimed an exemption for my/our residence in an amount in excess of the statutory cap as

prohibited by §522(q)(1) of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(B)**

G. No proceeding is pending in which I may be found guilty of a felony of the kind described in §522(q)(1)(A) or in which I may be found liable for a debt of the kind described in §522(q)(1)(B). **11 U.S.C. §1328(h)(2)**

H. I have made all payments required by my confirmed Chapter 13 plan.

2. Debtor hereby moves the court for the entry of a discharge order in this case.

Signed: /s/ Rachel Ann Nunez
Rachel Ann Nunez

07-15-2025
Date

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr., MS Bar No. 103469
Attorney for the Debtor
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601.500.5533

07-15-2025
Date

3. Mailing address for filing responses:

Jackson Office:
Danny L. Miller, Clerk
United States Bankruptcy Court
Thad Cochran US Courthouse
501 E Court St, Ste 2.300
Jackson, MS 39201

Gulfport Divisional Office:
Danny L. Miller, Clerk
United States Bankruptcy Court
Dan M. Russell, Jr. U.S. Courthouse
2012 15th St, Suite 244
Gulfport, MS 39501

CERTIFICATE OF SERVICE

On July 15, 2025, a copy of this pleading was served on each of the persons listed on the attached service list either by prepaid United States mail or via electronic service through the Court's EM/ECF system at the mailing addresses and/or email addresses indicated.

Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

RACHEL ANN NUNEZ

CASE NO: 22-50612

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 7/15/2025, I did cause a copy of the following documents, described below,
Motion for Entry of Chapter 13 Discharge

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 7/15/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

RACHEL ANN NUNEZ

CASE NO: 22-50612

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 7/15/2025, a copy of the following documents, described below,

Motion for Entry of Chapter 13 Discharge

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 7/15/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 22-50612
SOUTHERN DISTRICT OF MISSISSIPPI
TUE JUL 15 8-15-16 PST 2025

SPEEDYRAPID CASH
15 BULL STREET
SUITE 200
SAVANNAH GA 31401-2686

~~EXCLUDE~~

~~US BANKRUPTCY COURT
DAN M RUSSELL JR US COURTHOUSE
2012 15TH STREET SUITE 244
GULFPORT MS 39501-2036~~

~~EXCLUDE~~

(P)AUTOVEST LLC
ATTN BANKRUPTCY
26261 EVERGREEN RD SUITE 390
SOUTHFIELD MI 48076-4447

~~(D) (P)AUTOVEST LLC
ATTN BANKRUPTCY
26261 EVERGREEN RD SUITE 390
SOUTHFIELD MI 48076-4447~~

HENLEY LOTTERHOS HE
PO BOX 389
JACKSON MS 39205-0389

IOWA DHS
822 DOUGLAS ST
SIOUX CITY IA 51101-1029

(P)MERCHANTS ADJUSTMENT SERVICE INC
ATTN ATTN SHERI
PO BOX 7511
MOBILE AL 36670-0511

NELNET
PO BOX 82561
LINCOLN NE 68501-2561

NUWAY AUTO
12083 US 49
GULFPORT MS 39503-3171

PARAMOUNT CAPITAL GROU
PO BOX 409
CONSHOHOCKEN PA 19428-0409

SPEEDY CASH
3611 N RIDGE RD
WICHITA KS 67205-1214

~~EXCLUDE~~

~~(D)SPEEDYRAPID CASH
15 BULL STREET STE 200
SAVANNAH GA 31401-2686~~

TORRID
PO BOX 659584
SAN ANTONIO TX 78265-9584

US DEPARTMENT OF EDUCATION CO NELNET
121 SOUTH 13TH STREET STE 201
LINCOLN NE 68508-1911

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6-430
JACKSON MS 39201-5022~~

DEBTOR

RACHEL ANN NUNEZ
2626 ALLEN CREST DR
CORPUS CHRISTY TX 78415-5652

~~EXCLUDE~~

~~THOMAS CARL ROLLING JR
THE ROLLING LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767~~

~~EXCLUDE~~

~~(P)WARREN A CUNTZ T1 JR
PO BOX 3749
GULFPORT MS 39505-3749~~